

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO. 2:21 cr 237
	:	
vs.	:	JUDGE SARGUS
	:	
LEATHA I. SAVAGE,	:	
	:	
Defendant.	:	

**DEFENDANT’S REQUEST FOR EXTENSION OF TIME TO SUBMIT
FINAL PRESENTENCE INVESTIGATION REPORT**

Now comes Defendant Leatha I. Savage, through undersigned counsel, and respectfully requests that the Court grant the Probation Office an extension of time until March 11, 2022, in which to submit its final presentence investigation report in the above-captioned matter. The reasons in support of this request are set forth in the following Memorandum.

Respectfully submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

MEMORANDUM

The initial presentence investigation report in this matter was prepared on January 19, 2022. Defendant was to submit her objections by February 9, 2022, and the final report is to be filed on February 28, 2022. Unfortunately, due to the considerable factual and legal review required, and Counsel's extremely busy trial docket, Defendant was unable to serve Probation Officer Mueller and the United States with her objections until February 19, 2022. Accordingly, based on the foregoing, Defendant respectfully requests that the Probation Office be granted an extension of time until March 11, 2022, in which to file its final presentence investigation report.

Respectfully submitted,

/s/ **Samuel H. Shamansky**
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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Sheila Lafferty, United States Attorney's Office, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215 on February 25, 2022.

/s/ **Samuel H. Shamansky**
SAMUEL H. SHAMANSKY